Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Amendment of the Commission's Rules to Promote Aviation Safety	)))))	WT Docket No. 19-140

COMMENTS OF THE AIRLINES ELECTRONIC ENGINEERING COMMITTEE (AEEC)

I. AIRLINES ELECTRONIC ENGINEERING COMMITTEE (AEEC) AND ARINC INDUSTRY ACTIVITIES

A. The AEEC an international Standards Development Organization (SDO) that serves the world's Airlines and other airspace users. The AEEC prepares the ARINC Standards -- Aviation infrastructure and airborne avionics standards for the aviation community. In addition to Airline Membership, Airbus, Boeing, and the United State Air Force sit on the AEEC Executive Committee. Over 4000 technical specialists from over 250 industry organizations contribute to the ARINC Standards.

B. The AEEC supports the overall intent of the NPRM content (WT Docket No. 19-140) that pertains to AeroMACS with additional comments provided below. The AEEC would encourage licensing and implementation rules that expedite AeroMACS deployment at the world's airports.

C. **ARINC Characteristic 766:** Aeronautical Mobile Airport Communication System (AeroMACS) Transceiver and Aircraft Installation Standards (dated July 7, 2017) has been developed by the aviation industry for the purpose of enabling AeroMACS high-bandwidth data communication to and from the aircraft on the airport surface. The AEEC has developed this standard with the participation of airlines, airframe manufacturers, AeroMACS radio suppliers, FAA, EUROCONTROL and many others.

II. LICENSING AND ELIGIBILITY (NPRM ¶ 37)

A. ***"AeroMACS will be used by fixed, base, and mobile units on or near airport property, including aircraft, for airport services related to the safety and regularity of flight."***

B. The AEEC feels that flexible licensing and eligibility rules will expedite deployment of AeroMACS services. The proposed licensing rules could impose

unnecessary and onerous costs to AeroMACS service providers and users that could hinder the deployment of AeroMACS.

1. In particular, the proposed requirement for individual licensing of fixed, base and mobile AeroMACS units is unnecessary and onerous.

2. Coordination of AeroMACS spectrum used by service providers is best performed by a single industry channel manager.

III. ELIGIBILITY (NPRM ¶ 38)

A. ***"We propose to limit eligibility for non-aircraft AeroMACS licenses to airport owners and operators, and entities that have been granted permission by the airport owner."***

B. The AEEC feels that the proposed rules as written could restrict and limit AeroMACS services unless the airport owner is incentivized to provide such services.

1. The airline industry has discussed the potential role of AeroMACS services to improve the safety and on-time flight performance of commercial airline operations. AeroMACS will enable valuable aircraft system data to be sent wirelessly as soon as the aircraft lands, potentially an aid to taxi operations, alleviating airport congestion, reducing aircraft turnaround time, and allowing the future data intensive aircraft to send information seamlessly.

2. The Commission traditionally seeks to remove barriers to access to wireless services. Airlines request that the Commission remove artificial barriers to AeroMACS services to ensure that all interested service providers have equal ability to provide AeroMACS services.

IV. COORDINATION AND CHANNEL MANAGEMENT (NPRM ¶ 39)

A. ***"We propose to require applicants to coordinate with the relevant FAA Regional Office prior to filing an application with the Commission."***

B. The AEEC feels that flexible licensing and coordination rules are needed to enable the deployment of AeroMACS services and applications. The proposed coordination rules would impose unnecessary delays and costs on AeroMACS users.

1. The proposal to pre-coordinate AeroMACS deployments with FAA Regional Offices could impose significant and unnecessary delays to AeroMACS service providers during airport deployment. This cost would likely be passed along to the airline users.

2. Coordination of AeroMACS installations can be done at the airport level.

V. TECHNICAL RULES (NPRM ¶ 44)

A. ***"The technical standards for AeroMACS have been approved worldwide by numerous technical standards bodies."***

B. Aviation is an international business. Therefore, the AEEC supports the WiMAX Forum proposal suggesting that the Commission adopt technical rules for AeroMACS services that are aligned with technical standards approved by international technical standards bodies. In particular, the FCC should adopt the proposed technical rules based on the requirements currently incorporated in the International Civil Aviation Organization (ICAO) Standards and Recommended Practices (SARPS) and in the RTCA Minimum Operational Performance Standards (MOPS).

VI. CONCLUSION

The AEEC wholeheartedly supports the deployment of AeroMACS infrastructure and AeroMACS services. The FCC should impose rules that encourage AeroMACS deployment at airports. Every effort should be made to publish implementation rules that enable AeroMACS to be available internationally as competitive service offering. Users of AeroMACS services intend to procure these services using a market-based strategy.

Respectfully submitted,

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September 3, 2019